

SUPERIOR CRUDE GATHERING, INC.

FACILITY SECURITY PLAN

USCG Department of Homeland Security -
Maritime Security

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This Facility Security Plan (FSP) has been developed by Superior Crude Gathering, Inc. (SCG)



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to satisfy the requirements of 33 Code of Federal Regulations (CFR) - Navigation and Navigable Waters, Chapter I - Coast Guard , Department of Homeland Security, Subchapter H - Maritime Security.

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1) Security Administration and Organization of the Facility

Reference - 33 CFR §105.200, §105.205, §105.210, and §105.400.

1.1 Security Administration

The Facility Security Officer (FSO) shall ensure a Facility Security Plan (FSP) is developed for the SCG facility located at 700 East Sunray Road, Ingleside, Texas. This is the only facility operated by SCG subject to the requirements to develop an FSP. This FSP:

- ! Identifies the FSO by name and position, and provides 24-hour contact information;
- ! Is written only in English;
- ! Addresses each vulnerability identified in the Facility Security Assessment (FSA) (See Section 17 - Facility Security Assessment Report); and,
- ! Describes the security measures for each MARSEC Level.

FSO	Position	24-hour Contact Information
Jeff Kirby	SCG Owner/Facility Operator	Office - 361/882-5117 (b) (6)

1.1.1 FSP Facilities Covered

The only SCG facility covered by these regulations requiring a FSP is the crude oil transfer terminal located on Sunray Road, Ingleside, Texas; therefore, this FSP addresses activities at that facility only.

1.1.2 Sensitive Security Information (SSI)

This plan is considered Sensitive Security Information (SSI) and shall be protected in accordance with 49 CFR Part 1520.

1.1.3 Plan Format

This plan has been prepared, submitted, and maintained at the site in hard copy format.

1.2 Facility Security Organization

Only 3 - 5 SCG representatives will be allowed on-site while a vessel (towboat/barge) is docked at the facility in non-emergency situations. The presence of vessel personnel on-site, while the vessel is docked and during loading operations, is addressed in Section 6 - Procedures for Interfacing with Vessels. In the event of an emergency situation, as described in the facility Operations Manual/Response Plan, emergency personnel will be allowed to enter the site for

emergency response and remediation activities only.

The facility security organization is as follows:

Person Exercising Security Duties & Responsibilities	Support
Jeff Kirby	SCG Owner/Facility Operator/FSO
Brian Amsden	General Manager
Jimmy Alcott	Facility Manager

1.2.1 FSO Designation

The following individual is designated as the FSO for this facility.

FSO	Title	24-hour Contact Information
Jeff Kirby	SCG Owner/Facility Operator	Office - 361/882-5117 (b) (6)

1.2.2 Facility Security Requirements

- A Facility Security Assessment (FSA) was conducted (See Section 17 of this plan);
- This FSP was developed and submitted;
- The facility will operate in compliance with the approved FSP; and,
- An adequate coordination of security issues takes place between the facility and vessels that call on it, including the execution of a DoS (See Sections 6 and 7 of this plan).

1.2.3 Coordination of Shore Leave for Vessel Personnel or Crew Change-Out

Under normal operating conditions, vessel personnel will not leave or enter the site and will not receive visitors, due to the normal short term duration of vessel loading procedures. In the event of circumstances; however, necessitating the departure or arrival of vessel personnel or visitors to the vessel, the procedures described in Section 10 - Security Measures for Access Control, Including Designated Public Access Areas, will be implemented.

1.2.4 MARSEC Levels

In the event the Coast Guard issues MARSEC Directives that require additional

mandatory security measures, the facility shall comply with the relevant instructions contained in the Directive within the time period prescribed by the Directive. The FSO will, also, provide acknowledgment to the Captain of the Port (COTP) of receipt of all MARSEC Directives issued by the Coast Guard in the time period mandated by the Directive. SCG will specify the method(s) by which the measures in the MARSEC Directives have been or will be (as appropriate) implemented.

Procedure:

- Upon receipt of the Coast Guard MARSEC Directive, the FSO will review the directive in detail to ascertain any and all details of all additional mandatory security requirements and all time frames for acknowledgment and implementation of the requirements;
- The FSO will contact the COTP and acknowledge receipt of the Directive within the specified time period for acknowledgment;
- The FSO will utilize all resources available to establish effective methods for implementation of all additional security measures mandated by the Directive;
- Upon agreement by all personnel and resources involved in the development of the methods, the methods will be written (if time allows) and communicated to the COTP by the most appropriate means including verbally by phone, facsimile, delivery, or email;
- In the event the Coast Guard does not approve or accept the methods as proposed, facility personnel and resources will be utilized again and the above procedures will be duplicated until acceptable methods are developed;
- The amended methods will be communicated to the COTP as described above; and,
- Upon acceptance by the COTP of the proposed methods, the FSO will ensure that implementation of the approved methods is effected in accordance with the time limits specified by the Directive.

1.2.5 Unattended Vessel Security and Safety Requirements

- Facility management will ensure security for unattended vessels docked at the facility (See Section 6 of this plan); and,
- Consistency between security requirements and safety requirements will be maintained at the facility.

1.2.6 Security Reports

All breaches in security at the facility will be reported immediately to the National Response Center by the FSO. The facility does not transport; however, due to their proximity to a marine transportation waterway, if a transportation security incident is observed by facility personnel, the incident will be reported immediately to the National Response Center by the FSO, as well.

Telephone, facsimile, or electronic notifications to the National Response Center will be made to one of the following numbers:

1-800-424-8802
202/267-2675 (Direct Number)
202/267-2165 (Fax)
202/267-4477 (TDD)
1st.nrcinfo@comdt.uscg.mil

The information regarding all security breaches will be recorded by the FSO on the facility Breaches of Security Report Form (See Attachment A - Breaches of Security Report Form). The FSO will obtain as much information as possible for the report from site inspection, as necessary, and interviews with witnesses of the incident.

1.3 Facility Security Officer (FSO)

As indicated above, the SCG owner/facility operator, Jeff Kirby, is the FSO.

1.3.1 FSO General Duties

The FSO performs other duties at the facility and within the SCG organization; however, he is able to perform the duties and responsibilities of the FSO as describe below. The FSO assigns security duties to other facility security personnel; however, the FSO is responsible for the effective implementation of all required security duties.

The FSO will:

- Be responsible for the overall development, maintenance, and implementation of all facility security requirements specified by 33 CFR Chapter I - Coast Guard, Department of Homeland Security and Subchapter H - Maritime Security;
- Be responsible for the only facility operated by SCG located at 700 East Sunray Road, Ingleside, TX;
- Assign duties to other facility security personnel;
- Supervise other facility security personnel in the performance of their duties;
- Monitor the implementation of security measures by other facility security personnel, including review of security inspection and Declaration of Security (DoS) records;
- Communicate with the Vessel Security Officer (VSO) and coordinate vessel arrivals and departures;

- Communicate vessel activity information (arrivals/departures) to other facility security personnel;
- Coordinate vessel crew changes and visitations with the VSO and communicate that information with other facility security personnel; and,
- Investigate and report all security breaches.

1.3.2 FSO Qualifications

The FSO is qualified to coordinate the development, maintenance, and implementation of this FSP. He has general knowledge through experience and training of the following:

- The facility security organization;
- General vessel (barge) and facility operations and conditions;
- Vessel and facility security measures, including the meaning and the requirements of the different MARSEC Levels;
- Emergency preparedness, response, and contingency planning;
- Security equipment and systems, and their operational limitations; and,
- Methods of conducting audits, inspections, control, and monitoring techniques.

1.3.3 FSO Responsibilities

The FSO will have, at a minimum, all the responsibilities delineated in 33 CFR §105.2059(c)(1)-(18) as follows:

- Ensure that the FSA is conducted;
 - Ensure the development and implementation of a FSP;
 - Ensure that an annual audit is conducted, and if necessary, that the FSA and FSP are updated;
 - Ensure the FSP is exercised per 33 CFR §105.220;
 - Ensure that regular security inspections of the facility are conducted;
 - Ensure the security awareness and vigilance of the facility personnel;
 - Ensure adequate training to personnel performing facility security duties;
 - Ensure that occurrences that threaten the security of the facility are recorded and reported to the proper authorities;
 - Ensure the maintenance of all required records;
 - Ensure the preparation and the submission of all required reports;
 - Ensure the execution of any required DoS with the VSO;
 - Ensure the coordination of security services in accordance with the approved FSP;
 - Ensure that security equipment is properly operated, tested, calibrated and maintained;
 - Ensure the recording and reporting of attainment changes in MARSEC Levels to the owner or operator and the cognizant COTP;
-
- When requested, ensure that the VSO receives assistance in confirming the identity of visitors and service providers seeking to board the vessel through the facility;
 - Ensure notification, as soon as possible, to law enforcement personnel and other emergency responders to permit a timely response to any transportation security

- incident;
- Ensure that the FSP is submitted to the cognizant COTP for approval, as well as any plans to change the facility or facility infrastructure prior to amending the FSP; and,
- Ensure that all facility personnel are briefed of changes in security conditions at the facility.

1.3.3 Facility Personnel with Security Duties

Facility personnel, other than the FSO, who are assigned security duties by the FSO, are responsible for those duties and have general knowledge (as specified by 33 CFR §105.210), through training (See Section 2 - Personnel Training) and on-the-job experience to effectively implement those duties.

2) Personnel Training

Reference 33 CFR §105.205(b)(1) and (2).

All facility personnel, with responsibilities for the implementation of provisions in this FSO, will

gain knowledge of those duties through training, as specified in this section of the plan, and through on-the-job experience. There are three primary facility representatives described in this plan as having security related responsibilities. These representatives are the FSO and the other facility personnel with security duties assigned by the FSO - the General Manager and the Facility Manager (See Section 1.2 - Facility Security Organization). Under heightened MARSEC Level security conditions, the FSO may assign additional facility personnel to function special security duties as specified by the Coast Guard Directive. No contractors are utilized for security related activities at the site.

2.1 FSO Training

The FSO must have knowledge, through training or on-the-job experience, of the items delineated in 33 CFR §105.205(b)(1)(i) - (vi). This knowledge has been gained by the following means:

- ! Items (i) Security organization of the facility and (ii) General vessel and facility operations and conditions, were gained by on-the-job experience from the years of materials handling management experience;
- ! Knowledge of item (iii) Vessel and facility security measures, including the meaning and the requirements of the different MARSEC Levels, was gained during the preparation of the facility security program described in this plan;
- ! Knowledge of item (iv) Emergency preparedness, response, and contingency planning, was gained during training required by the facility Operations Manual and Response Plan; and,
- ! Knowledge of items (v) Security equipment and systems, and their operational limitations and (vi) Methods of conducting audits, inspections, control, and monitoring techniques, was gained by on-the-job experience and during the development of this plan.

Knowledge of the items delineated in 33 CFR §105.205(b)(2)(i) - (xiv) was gained through classroom training. Each of these items will be addressed. Training will be provided by qualified contract instructor(s) and will be conducted prior to the initial implementation of this plan, and be renewed annually thereafter. Records of this training will include, at a minimum, the date of training, the duration of training, a description of the training, the instructor's name printed, the instructor's signature, and the signature of the FSO, each attendee's name printed, and the signature of each attendee. Records of the training will be maintained in accordance with Section 4 - Records and Documentation of this plan.

2.2 Facility Personnel with Security Duties Training

Prior to the implementation of this plan, facility security personnel, assigned by the FSO, will receive training in accordance with this section and annually, thereafter. This training will be classroom training and, at a minimum, address the items delineated in 33 CFR §105.215(a) - (e) and the provisions in this plan. Training will be provided by the FSO or a contract instructor. In the event of re-assignment of existing facility security personnel, newly assigned facility security

personnel will receive training prior to implementing their security duties. Training records will include, at a minimum, the date, the duration of the training session, a description of the training, the name of the instructor printed, the signature of the instructor, the signature of the FSO, the printed name of all attendees, and the signature of all attendees.

2.3 Other facility Personnel & Contractor Training

On occasion, facility truck drivers, but no contractors, will be present during normal loading and unloading activities while vessels are docked at the facility and will not be involved in security activities at the site.

3) Drills and Exercises

Reference 33 CFR §105.220.

3.1 General Statement

Drills and exercises shall be conducted to test the proficiency of facility personnel in assigned

security duties at all MARSEC Levels and the effective implementation of the FSP. These drills and exercises shall enable the FSO to identify any related security deficiencies that need to be addressed.

A drill or exercise may be satisfied with the implementation of security measures required by the FSP as the result of an increase in the MARSEC Level, provided the facility reports attainment to the COTP.

3.2 Drills

Drills will be developed and implemented by the FSO at the frequency indicated in Section 3.2.1 below. The FSO will establish a drill scenario and the method based on either a mock response to a security threat or a mock incident. The drill must be adequate enough to enable the FSO to effectively evaluate the proficiency of facility security personnel at all MARSEC Levels and the effective implementation of the FSP. The drill must, also, be effective enough to reveal any security deficiencies and; therefore, allow the FSO to correct any deficiencies in the FSP.

The FSO will notify facility security personnel at the appropriate time as to when the drill is implemented and not too soon to diminish the integrity of the drill. Care must be taken; however, to not cause a false alarm to the COTP or other emergency response agencies. Upon completion of the drill, the FSO will review the drill scenario and response with the other facility security personnel involved in the drill to evaluate the effectiveness of the FSP. In the event FSP deficiencies are determined, the FSO will implement a review of the FSP and evaluate subsequent upgrades to the plan for effectiveness.

Facility security personnel will undergo personnel training updates, in accordance with Section 2 - Personnel Training guidelines, in the event of FSP amendment.

Records of drills will be maintained in accordance with Section 4 - Records and Documentation and will include, at a minimum, the date of the drill, a description of the drill, the printed names of all participants in the drill, the signature of all participants in the drill, and a description of any FSP deficiencies established as a result of the drill.

3.2.1 Drill Frequency

The FSO will ensure at least one security drill will be conducted every 3 months. These drills may be held in conjunction with drills required by the facility Operations Manual and Response Plan.

3.2.2 Drill Types

The drills shall test individual elements of the FSP, including response to security threats

and incidents, and take into account:

- The types of operations at the facility;
- Facility personnel changes;
- Type of vessel (barges) the facility is serving; and,
- Other relevant circumstances.

3.3 Exercises

Exercises will be developed and implemented by the FSO at the frequency indicated in Section 3.3.1 below. The FSO will establish the exercise type described in Section 3.3.2 below. The exercise shall be a full test of the security program and shall include substantial and active participation of the FSO, and may include government authorities and vessels docked at the facility. Requests for participation of facility and VSO's in joint exercises should consider the security and work implications for the vessel. The exercise program will be facility-specific or a cooperative exercise program with applicable facility and vessel security plans. The facility is not located at a port facility.

The exercises shall test communications and Notification procedures, and elements of coordination, resource availability, and response.

The exercise must be adequate enough to enable the FSO to effectively evaluate the proficiency of the security program and the effective implementation of the FSP. The exercise must, also, be effective enough to reveal any security deficiencies and; therefore, allow the FSO to correct any deficiencies in the FSP.

The FSO will notify all other facility security personnel when the exercise will be implemented and require their participation. Care must be taken; however, to not cause a false alarm to the COTP or other emergency response agencies. Upon completion of the exercise, the FSO will review the drill scenario and response with the other facility security personnel involved in the drill to evaluate the effectiveness of the FSP. In the event FSP deficiencies are determined, the FSO will implement a review of the FSP and evaluate subsequent upgrades to the plan for effectiveness.

Facility security personnel will undergo personnel training updates, in accordance with Section 2 - Personnel Training guidelines, in the event of FSP amendment.

Records of exercises will be maintained in accordance with Section 4 - Records and Documentation and will include, at a minimum, the date of the drill, a description of the drill, the printed names of all participants in the drill, the signature of all participants in the drill, and a description of any FSP deficiencies established as a result of the drill.

3.2.1 Exercise Frequency

The FSO will ensure at least one security drill will be conducted at least once each calendar year, with no more than 18 months between exercises.

3.2.2 Exercise Types

The exercises shall be:

- Full scale or live;
- Tabletop simulation or seminar;
- Combined with other appropriate exercises; and,
- A combination of the elements of the above elements.

4) Records and Documentation

Reference 33 CFR §105.225

All records required to satisfy the requirements of this FSP will be maintained in hard copy form at the facility located at 700 East Sunray Road, Ingleside, Texas and at the Corporate Office in Corpus Christi, Texas. These records will be kept in a locked, concealed container or file cabinet at each location. Only the FSO and active facility security personnel will have an access key to the container and know of its location. Facility security personnel will be instructed not to access the record storage container when non-security personnel are present and not disclose

to anyone, other than regulatory authorities conducting an audit of the security program, the location of the container under any circumstances. All required records will be maintained for a period of at least 2 years and will be made available to the Coast Guard upon request.

Records of the following program requirements (See Attachment A) will be maintained as described above:

- ! Training
- ! Drills and exercises
- ! Incidents (TSI's) and breaches of security
- ! Changes in MARSEC Levels
- ! Maintenance, calibration, and testing of security equipment
- ! Security threats
- ! Declaration of Security (DoS)
- ! Annual audit of the FSP

Specific record content requirements will be described in the respective FSP sections.

5) Response to Change in MARSEC Level

Reference 33 CFR §105.230.

5.1 Compliance with MARSEC Level

The facility shall operate in compliance with security requirements of 33 CFR Part 105 for the MARSEC Level in effect for the port.

5.2 Notification of Increase in MARSEC Level

When notified by the COTP of an increase in the MARSEC Level, the FSO will:

- ! Determine whether a vessel is currently docked at the facility or scheduled to arrive at the facility;
- ! If a vessel is docked at the facility, the FSO will contact the VSO, notify the VSO of the increase in MARSEC Level, and revise the DoS as necessary;
- ! If a vessel is scheduled to arrive at the facility, the FSO will notify the VSO as soon as possible of the increase in MARSEC Level and the DoS will reflect the correct MARSEC Level;
- ! The FSO will authorize the Facility Manager to inspect the facility to ensure that the required additional security measures are implemented in less than 12 hours;
- ! Upon completion of the inspection, the Facility Manager will report the compliance status to the FSO and complete a Record of Changes in MARSEC Level Log;
- ! The FSO will address any noncompliance with the additional security measures to ensure compliance; and,
- ! Upon completion of the items above, the FSO will report the compliance status to the COTP.

5.2.1 MARSEC Level 2 & 3

At MARSEC Levels 2 & 3, the FSO shall inform all facility personnel about identified threats, and emphasize reporting procedures and stress the need for increased vigilance. In the event the facility cannot achieve compliance with the MARSEC Level 2 & 3 requirements, the FSO must contact the COTP, inform the COTP of the noncompliance, and obtain approval from the COTP prior to allowing the vessel to dock at the facility or continuing operations.

5.2.2 MARSEC Level 3

At MARSEC Level 3, the facility may be required to implement additional measures, pursuant to 33 CFR Part 6, 160, or 165, as appropriate, which may include but are not limited to:

- Use of waterborne security patrol;
- Use of armed security personnel to control access to the facility and to deter, to the maximum extent practical, a TSI; and,
- Examination of piers, wharves, and similar structures at the facility for the presence of dangerous substances or devices underwater or other threats.

6) Procedures for Interfacing With Vessels

Reference 33 CFR §105.240

The facility deals with a limited number of towboat companies. The barges utilized by the facility are inland barges and do not venture beyond the line of demarcation. Barges that dock at the facility are either loaded (most often) or unloaded (occasionally) and the material transferred is always crude oil. Only 3 - 4 transfers are conducted per month for a maximum of approximately 15,000 tons of crude oil transferred per month. When vessel activities are initiated the following procedures will be implemented:

- ! The FSO will contact the VSO to schedule the arrival and departure of vessels, within 24 hours of activity;

- ! At the time of initial contact, the VSO will notify the FSO of any anticipated crew changes, visitors to the vessel crew, stores delivery, or inspections while the vessel is docked at the facility;
- ! The Facility Manager will require anyone involved in crew change, visitation, stores delivery, or inspections to comply with Section 10 - Security Measures for Access Control;
- ! Upon arrival at the facility, the Facility Manager will inspect the vessel for security concerns;
- ! Upon confirmation that there are no security concerns, the Facility Manager and VSO will complete the respective DoS and Declaration of Inspection (DOI) as required by the facility Operations Manual;
- ! The Facility Manager will ensure that crew, visitors, stores delivery personnel, and cargo inspector do not enter restricted areas;
- ! The cargo transfer will be implemented in accordance with the approved facility Operations Manual/Response Plan;
- ! The Facility Manager will inspect any stores removed from the vessel or transported to the site prior to loading onto the vessel. No fueling takes place at the facility;
- ! The Facility Manager will ensure that no unaccompanied baggage enters or leaves the site at any time;
- ! While the vessel is docked, continuous monitoring of the facility and adjacent waterway will be conducted by the Facility Manager and VSO in accordance with Section 14 - Security Measures for Monitoring;
- ! Changes in MARSEC Levels will be communicated to the VSO by the FSO in accordance with Section 5 - Response to Change in MARSEC Level;
- ! The Facility Manager or General Manager will notify the FSO and VSO of any security breaches or incidents in accordance with Section 15 - Security Incident Procedures; and,
- ! All of the above activities involving record keeping will be accomplished in accordance with Section 4 - Records and Documentation.

7) Declaration of Security

Reference 33 CFR §101.505 and §105.245.

7.1 Declaration of Security Form

A DoS is completed and signed in accordance with the procedures described in Section 6 - Procedures for Interfacing With Vessels. An example DoS is maintained in this FSP in Attachment A - Forms.

7.2 DoS Procedures

- ! The FSO will notify the VSO of the requirement for a DoS when the FSO contacts the VSO to schedule the arrival and departure of vessels as described in Section 6 -

- Procedures for Interfacing With Vessels;
- ! At that time, the facility/vessel security needs will be established for incorporation into the DoS;
 - ! The FSO will complete the appropriate sections of the DoS and forward a copy to the Facility Manager;
 - ! All DoS requests from vessels will be directed to the FSO;
 - ! The signed facility DoS is required prior to initiating any transfers; and,
 - ! The Facility Manager and VSO will sign the DoS in accordance with the procedures discussed in Section 6 - Procedures for Interfacing With Vessels.

Other occasions when a DoS will be requested by the facility are when:

- ! The facility is operating at a higher security level than the vessel;
- ! A change in MARSEC Level requires additional security measures be implemented;
- ! A MARSEC Directive requires additional security measures be implemented; and,
- ! There has been a security threat or a security incident involving the facility or involving the vessel, as applicable.

7.2.1 Implementation of the DoS

Passengers are not allowed to embark or disembark at the facility; however, neither the facility nor the vessel can initiate cargo or stores transfer until the DoS is signed and implemented.

7.2.2 Receipt of Manned Vessels Subject to 33 CFR Part 104 Requirements

At MARSEC Level 2 & 3, the FSO, or their designated representative, of this facility when interfacing with manned vessels subject to 33 CFR Part 104, shall sign and implement DoS's as follows:

- ! Prior to arrival of a vessel to the facility, the FSO and Master, VSO, or their designated representatives shall coordinate security needs and procedures, and agree upon the contents of the DoS for the period of time the vessel is at the facility; and,
- ! Upon arrival of the vessel at the facility, the FSO, VSO, or their designated representative, must sign the written DoS.

7.2.3 Frequent Interfacing with the Same Vessel

At MARSEC Level 1 or 2, the FSO of this facility, when interfacing with the same

vessel(s) listed below, may implement a continuing DoS for multiple visits, provided that:

- ! The DoS is valid for a specific MARSEC Level;
- ! The effective period at MARSEC Level 1 does not exceed 90 days; and,
- ! The effective period at MARSEC Level 2 does not exceed 30 days.

7.2.4 MARSEC Level Increases

When the MARSEC Level increases beyond that contained in the DoS, the continuing DoS is void and a new DoS shall be executed.

7.2.5 Records

A copy of all currently valid continuing DoS's shall be kept with the FSP.

7.2.6 COTP Mandate

The FSO shall implement a DoS with the VSO prior to any vessel-to-facility interface when required and deemed necessary by the COTP.

8) Communications

Reference 33 CFR §105.235(a)-(b).

8.1 Notification

As described in Section 5 - Compliance with MARSEC Level, the FSO will communicate changes in security conditions to facility personnel. This will be accomplished via cellular telephones or VHF radios provided by the facility and vessel.

8.2 Procedures

The personnel involved in facility security (the FSO, General Manager, and Facility Manager) have in their possession, whenever vessels are docked at the facility, the cellular telephones provided by the facility, for rapid communication of security related information to each other, vessels interfacing with the facility, the COTP, and government authorities.

8.2.1 Active Facility Access Points

There is one land based access point to the facility. Only access by authorized crew changes, visitations, delivery of stores, emergency response personnel, and government authorities with security responsibilities are allowed through the access point while vessels are docked at the facility. The access gate must be left open during transfer operations, in the event of a security or environmental incident requiring expeditious evacuation. All access will be monitored by facility security personnel in accordance with Section 10- Security Measures for Access Control. These facility security personnel will have, in their possession, at all times while providing authorized access, cellular telephones for communication with police, security control, or emergency operations centers.

8.2.1 Backup Communications Systems

In the event of cellular telephone failure, facility security personnel will utilize the hand held VHF radios provided or dispatch a messenger to communicate necessary security information.

9) Security Systems and Equipment Maintenance

Reference 33 CFR §105.250(a)-(c).

9.1 Security Systems

Security systems and equipment utilized at the site include a 6-foot chain link fence with locked access gate, locks on valves on the transfer equipment, warning signs, and security lighting. These security systems and equipment shall be in good working order and inspected, tested, and maintained according to manufacturers' recommendations.

9.2 Security System Testing and Maintenance & Corrective Actions

The security system utilized at the site that necessitates testing is the security lighting. Upon notification to the Facility Manager, by the FSO, that a vessel will be arriving, the Facility Manager will test the lighting system to assure proper operation upon arrival by the vessel. A record of the testing event will be recorded in the Record of Maintenance, Calibration, and

Testing of Security Equipment Log (log). This record will be maintained in accordance with Section 4 - Records and Documentation.

In the event of system failure, the Facility Manager will note the deficiency in the log and correct the deficiency prior to the arrival of the vessel. Upon completion of corrective actions, the Facility Manager will note the correction in the log.

In addition to testing the lighting, the fence, gate, gate lock, valve locks, and signs will be inspected for defects. The inspection will be noted in the log. Deficiencies will be noted in the log and corrected prior to arrival of the vessel. The corrective actions will be noted on the log.

10) Security Measures for Access Control, Including Designated Public Access Areas

Reference 33 CFR §105.255 and §105.106.

10.1 General

The facility owner or operator shall ensure the implementation of security measures to:

- ! Deter the unauthorized introduction of dangerous substances and devices, including any device intended to damage or destroy persons, vessels, facilities, or ports;
- ! Secure dangerous substances and devices that are authorized by the owner or operator to be on the facility; and,
- ! Control access to the facility.

10.2 Identification of Access Areas

10.2.1 Designated Restricted Access Areas at the Facility

The following areas are locations on-site where access is controlled by the facility.

- The facility entrance gate on Sunray Road; and,
- The bulkhead along the waterfront.

10.2.2 Restrictions/Prohibitions and Enforcement

- The access gate at Sunray Road will be visually monitored at all times when vessels are docked at the facility. Only authorized facility personnel, vessel crew, stores deliveries, visitors, the cargo inspector, emergency response personnel, and regulatory authorities will be allowed access when necessary for normal operating activities, security purposes, emergency response, or inspections;
- The bulkhead, along the waterfront, will be monitored for unauthorized entry attempts by facility security personnel and vessel crew. Only vessel crew, emergency response personnel, or regulatory authorities will be allowed to enter from the water when necessary for normal operating activities, security purposes, emergency response, or inspections; and,
- Any attempts to access these areas by anyone other than those individuals described above, for reasons other than those described above, will be considered a breach of security and trigger breach of security or incident procedures in accordance with Section 15 - Security Incident Procedures.

10.2.3 Identification of Restricted Access Areas

Restricted Access Areas will be identified with signs posted at strategic locations and visible from any possible access point to anyone approaching the restricted area. The signs will identify the access area as a restricted area and that unauthorized personnel are prohibited from entry.

10.3 Personnel Identification System

Due to the limited number of vessels and the limited number of crew on the vessels, personal recognition is the most effective means for identification of vessel crew. On occasion; however, towboat companies may replace crew with unfamiliar individuals, visitors to the crew may be authorized, stores may be delivered, and cargo inspections are always conducted. Any time crew change occurs, visitors are anticipated, delivery of stores occurs, and cargo inspections are conducted, facility security personnel must be able to effectively identify these individuals. Only facility security personnel and, on occasion, facility truck drivers are authorized by the facility to be on-site while a vessel is docked at the facility. All other entrants to the site will be related to the vessel, emergency response personnel, or regulatory authorities visiting the site. These other entrants must be effectively identified.

Considering the above, identification of personnel entering the site will be effected as follows:

- ! At the time the FSO and VSO are making arrangements for arrival of a vessel, the FSO must inquire whether new crew members, visitors to crew members, stores delivery services, or cargo inspectors are anticipated to be on-site while the vessel is docked at the facility;
- ! To the extent practicable, the VSO must provide the names, valid driver's license numbers, and a brief description of these individuals from information available on the valid driver's license;
- ! Each time a new crew member first arrives at the facility, they must show photo identification (valid driver's license, USCG Mariner's Document, or valid passport) to the facility security personnel prior to signing the DoS;
- ! Each time new visitors, delivery personnel, or inspectors arrive at the facility from Sunray Road, they must show photo identification (valid driver's license, USCG Mariner's Document, or valid passport) to the facility security personnel at the entry gate;
- ! Each time emergency response personnel first enter the facility, they must sign an entrance log, indicate their valid drivers license number on the log adjacent to their signature, and show photo identification (valid driver's license, USCG Mariner's Document, or valid passport) to facility security personnel. They must do this prior to entering the site. They may be responding to an emergency on or near the facility in which access to the facility is required. This procedure may be waived if extreme emergency circumstances warrant otherwise. In the event of extreme emergency circumstances, a note will be made on the entrance log describing the extreme emergency circumstances, the number of emergency response individuals entering the site, and the company or agency that these individuals work for; and,
- ! Each time regulatory authorities enter the facility for the first time, they will be requested to show official identification and sign the entrance log.

Attempts by anyone to bypass the security check system will be considered a breach of security and incident and be managed in accordance with Section 15 - Security Incident Procedures. The identification system will be evaluated each time an evaluation of the FSO occurs and improved as necessary.

10.4 Access Control Frequency

To establish access control frequency, standards specified in the MARSEC Directive (105-3) will be utilized.

10.5 Access Control Requirements at MARSEC Level 1

- ! At MARSEC Level 1, personnel, personal effects (baggage is not allowed on-site), and government officials entering the site, while a vessel is docked, will be screened by hand as indicated in Section 10.3 - Personnel Identification System above;
- ! Vehicles will not be allowed into restricted areas as indicated by signs posted along the

boundary of the restricted area identifying the area as being restricted to authorized personnel only;

- ! At the entry gate on Sunray Road, a sign is posted that states “Upon entry to this facility, you are consenting to screening and inspection. Failure to comply will result in denial of authorization to enter.”;
- ! Failure to comply with the posting will be enforced;
- ! An attempt by anyone to circumvent the requirement will be considered a security breach and managed in accordance with Section 15 - Security Incident Procedures;
- ! Access to the site is either by land through the entrance gate on Sunray Road or along the waterfront by vessel;
- ! The Facility Manager will monitor personnel and vehicle traffic arriving and departing the site and will enforce the restriction of unauthorized personnel, and
- ! Minimum screening rates will be as follows -
 - Personnel and personal effects - 5%
 - Vehicle occupants - 5%
 - Vehicles - 15%

10.6 Access Control Requirements at MARSEC Level 2

- ! Hand screening of personnel and personal effects takes place at all times when a vessel is docked at the facility; therefore, screening will be effected as described in Section 10.3 - Personnel Identification System above;
- ! Facility security personnel will be posted at the Sunray Raod entrance as a guard to intercept personnel and vehicles arriving and departing the site while a vessel is docked at the facility;
- ! The facility security guard will be able to view the entire fence and land boundary;
- ! Visitors without valid cause for entry, directly related to the implementation of the operations, security, safety, or emergency response will not be allowed entry;
- ! Waterfront access is denied to everyone except facility security personnel, vessel personnel, emergency response personnel, or government officials;
- ! Vehicles entering the site must stay in the unrestricted area and may be searched at the discretion of the facility security personnel;
- ! Any attempt to circumvent these requirements will be considered a security breach and managed in accordance with Section 15 - Security Incident Procedures; and
- ! Minimum screening rates will be as follows -
 - Personnel and personal effects - 25%
 - Vehicle occupants - 10%
 - Vehicles - 50%

10.7 Access Control Requirements at MARSEC Level 3

- ! Hand screening of personnel and personal effects takes place at all times when a vessel is docked at the facility; however, for MARSEC Level 3, everyone entering the site, including recognizable personnel, will be screened as described in Section 10.3 - Personnel Identification System above;

- ! Facility security personnel will be prepared to cooperate with responders and facilities;
- ! Only responders to a security threat or incident will be allowed access to the facility while a vessel is docked at the facility;
- ! All access to the facility, other than facility security personnel, may be denied;
- ! Cargo transfer operations may be suspended;
- ! The facility may be evacuated;
- ! All personnel and vehicle traffic may be suspended;
- ! The frequency of security patrols may increase; and
- ! Minimum screening rates will be as follows -
 - Personnel and personal effects - 100%
 - Vehicle occupants - 100%
 - Vehicles - 100%

Within the time prescribed within the MARSEC Directive, the owner or operator shall comply with the relevant instructions contained in MARSEC Directive issued by the Coast Guard.

10.8 Public Access Areas

There are no public access areas at the site. All public access is denied.

11) Security Measures for Restricted Areas

Reference 33 CFR §105.260.

11.1 General

This plan shall ensure the designation of restricted areas in order to:

- ! Prevent or deter unauthorized access;
- ! Protect persons authorized to be in the facility;
- ! Protect the facility;
- ! Protect vessels using and serving the facility;
- ! Protect sensitive security areas within the facility;
- ! Protect security and surveillance equipment and systems; and,
- ! Protect cargo and vessel stores from tampering.

11.2 Designation of Restricted Areas

The following areas within the facility are considered restricted areas:

- ! Any area within 20 feet of the waterfront or bulkhead;

- ! An area at least 30 feet from the cargo transfer facility;
- ! An area at least 20 feet from the security lighting control;
- ! The office trailer; and,
- ! The storage building.

Clearly visible signs, in English, will be posted at the approach to all restricted areas. The signs will state, “Restricted Area Beyond This Point. Authorized Personnel Only. Unauthorized Entry Constitutes a Breach of Security.”. These signs will be posted along the waterfront and visible to anyone approaching from the water, and along the facility roadway and parking area and visible to anyone entering the facility through the Sunray Road access. All unauthorized entries or deliberate attempts by unauthorized personnel to enter, will be managed in accordance with Section 15 - Security Incident Procedures.

11.3 Security Measures for Restricted Areas

11.3.1 Authorized Facility Personnel

- FSO
- General Manager
- Facility Manager
- Drivers assigned by the FSO
- Additional facility security personnel assigned by the FSO

11.3.2 Authorized Personnel Other Than Facility Personnel

- Vessel Captain
- Vessel Tankermen
- Vessel Crew
- Cargo Inspector
- Visitors authorized by the FSO
- Emergency Response Personnel
- Government Authorities

11.3.3 Authorized Access Conditions

With the exception of emergency response personnel or government authorities, non-facility personnel are authorized to enter the restricted areas only when vessels are docked at the facility. Only facility personnel are authorized in facility restricted areas when vessels are not docked at the facility. To obtain authorization for non-facility personnel to enter, when vessels are docked at the facility, advance notice to the FSO by the VSO is required prior to the personnel arrival at the site whether entry is via waterfront or Sunray Road access. Upon arrival, authorization to enter is granted at the point of signature of the DoS, if entry is via waterfront, or the Entrance Log if entry is via Sunray Road.

11.3.4 Extent of Restricted Areas

See item 11.2 above.

11.3.5 When Access Area Restrictions are in Effect

Access area restrictions are in effect at all times when vessels are docked at the facility.

11.3.6 Access Area Demarcation

Access area demarcation is described in Section 11.2 above.

11.3.7 Vehicle Control Procedures

Vehicle entry is via the Sunray Road entrance and is monitored by facility security personnel. Parking areas are designated by the restricted area warning signs and compliance with entry to restricted areas is enforced by facility security personnel. Loading and unloading of vehicles will be monitored by facility security personnel and is subject to inspection upon the discretion of facility security personnel. Signs posted at the Sunray Road entrance indicate that, "Upon entry to this facility, you are consenting to screening and inspection. Failure to comply will result in denial of authorization to enter." (See Section 10.5 Access Control Requirements at MARSEC Level 1).

11.3.8 Control of Cargo Transfers and Vessel Stores

- The cargo transfer equipment and valves are only to be accessed by facility personnel during loading/unloading, repair, and maintenance activities. Keys to the valves will be issued only to facility personnel.
- Vessel stores will be monitored by facility security personnel and are subject to inspection upon the discretion of facility security personnel. Signs posted at the Sunray Road entrance indicate that, "Upon entry to this facility, you are consenting to screening and inspection. Failure to comply will result in denial of authorization to enter." (See Section 10.5 Access Control Requirements at MARSEC Level 1).

11.3.9 Control of Unaccompanied Baggage or Personal Effects

- Unaccompanied baggage is not allowed on-site.
- Personal effects will be monitored by facility security personnel and is subject to inspection upon the discretion of facility security personnel. Signs posted at the Sunray Road entrance indicate that, "Upon entry to this facility, you are consenting to screening and inspection. Failure to comply will result in denial of authorization to enter." (See Section 10.5 Access Control Requirements at MARSEC Level 1).

11.4 Unauthorized Access or Activities within Restricted Areas at MARSEC Level 1

- ! At MARSEC Level 1, access restrictions will be implemented in accordance with Section 11.3 procedures;
- ! There are no inactive access points at the facility;
- ! The Facility Manager will be assigned to specifically monitor both land and water access points;
- ! All personnel will be subject to the personnel screening procedures described in Section 10.3 and no vehicles will be allowed in restricted areas;
- ! The FSO may assign facility security personnel to patrol the perimeter of the restricted areas;
- ! Facility security personnel will be utilized to monitor for unauthorized entry and movement within restricted areas;
- ! The Facility Manager is responsible for coordinating parking, loading, and unloading of vehicles within restricted areas;
- ! No unaccompanied baggage is allowed at the facility and personal effects may be inspected at the discretion of the FSO at any time while vessels are docked at the facility;
- ! The cargo transfer area is in a permanent restricted area; however, at the discretion of the FSO, an area outside the permanent restricted area may be designated for inspection of stores; and,
- ! All facility operations areas are in permanent restricted areas.

11.5 Unauthorized Access or Activities within Restricted Areas at MARSEC Level 2

- ! Access control and monitoring is conducted on a continuing basis while vessels are docked at the facility;
- ! The facility security personnel will patrol the boundary of restricted areas while a vessel is docked at the facility;
- ! The only access points to restricted areas are from Sunray Road and the waterfront;
- ! Parking is prohibited near vessels at all times;
- ! More stringent restrictions for authorizing the entrance of visitors will be implemented;
- ! Continuous monitoring and recording surveillance equipment will be utilized if ordered by the Coast Guard;
- ! The FSO may, at his discretion, order additional patrols, including waterborne patrols, around restricted areas; and,
- ! The FSO may, at his discretion, expand the boundaries of existing restricted areas.

11.6 Unauthorized Access or Activities within Restricted Areas at MARSEC Level 3

- ! The boundaries of existing restricted areas will be expanded to include the entire facility;
- ! All visitors will be restricted from access areas which became restricted areas; and,
- ! Facility security will conduct periodic searches of the entire area prior to the arrival of a vessel and during the time the vessel is docked at the facility.

Within the time prescribed within the MARSEC Directive, the owner or operator shall comply

with the relevant instructions contained in MARSEC Directive issued by the Coast Guard.

12) Security Measures for Handling Cargo

Reference 33 CFR §105.265.

12.1 General

The following procedures apply to security measures related to cargo handling:

- ! The cargo pipeline access point is well within a permanent restricted area;
- ! All vessels are inspected before, during, and after transfer of cargo by contract inspectors;
- ! Cargo loading is monitored continuously by facility security and vessel personnel;
- ! All cargo is transferred through the underground pipeline that surfaces inside the restricted area; therefore, no cargo passes through access points;
- ! No cargo is stored temporarily prior to loading;
- ! All cargo transfers are coordinated with the receiving facility, vessel, and cargo inspector;
- ! Security measures with the vessel are established at the time of scheduling departures and arrivals; and,
- ! The quality and quantity of cargo transferred is monitored before, during and after transfer by contract inspectors.

12.2 Cargo Handling Requirements at MARSEC Level 1

- ! The cargo and cargo transport unit (pipeline and hose) are examined prior to, and continuously during transfer operations;
- ! All cargo is transferred through the underground pipeline that surfaces at the transfer facility within the restricted area;
- ! At the discretion of the FSO, any vehicle entering the facility may be subject to inspection; and,
- ! All cargo passes through the pipeline.

12.3 Cargo Handling Requirements at MARSEC Level 2

- ! The cargo transfer facility is inspected prior to and continuously during cargo transfer;
- ! Screening of all vehicles entering the facility will be enforced;
- ! The FSO will discuss the need for enhanced security measures with the VSO and coordinate the implementation of those procedures with the facility and vessel personnel; and,
- ! The FSO will assign the Facility Manager to increase the frequency and intensity of visual and physical inspections as necessary to assure the integrity of the security system.

12.4 Cargo Handling Requirements at MARSEC Level 3

- ! At the discretion of the FSO, cargo transfer may be terminated or suspended until such time as deemed secure;
- ! Facility security personnel must always be prepared to cooperate with responders and the vessel; and,
- ! Contract inspectors are utilized to inspect vessels and cargo transfers during all cargo transfers.

Within the time prescribed within the MARSEC Directive, the owner or operator shall comply with the relevant instructions contained in MARSEC Directive issued by the Coast Guard.

13) Security Measures for Delivery of Vessel Stores and Bunkers

Reference 33 CFR §105.270.

13.1 General

Fueling of vessels never takes place at the facility. On occasion; however, stores may be delivered in small quantities to the vessel. The delivery of vessel stores will be discouraged by the FSO. The following procedures will be implemented for checking vessels stores when they pass through the facility:

- ! All delivery of stores will be coordinated with the FSO and VSO prior to delivery;
- ! The VSO must provide a license plate number to the FSO for each delivery vehicle;
- ! Upon arrival to the facility, the driver will be identified per Section 10.3 - Personnel Identification Systems and the vehicle license number will be verified;
- ! Stores will be examined by the Facility Manager for the integrity of the packaging;
- ! Stores will be placed directly on the vessel immediately after passing inspection;
- ! Stores will be inspected visually and physically; and,
- ! Vehicles must remain in the unrestricted area and within view of facility security personnel.

13.2 Delivery of Vessel Stores Requirements at MARSEC Level 1

- ! The FSO will ensure that all vessel stores are screened;
- ! The VSO must provide a list of all stores to be transported to the facility;
- ! Stores delivery vehicles will be subject to inspection at the discretion of the FSO; and,
- ! Delivery vehicles will not be allowed in restricted areas.

13.3 Delivery of Vessel Stores Requirements at MARSEC Level 2

- ! Each item of vessel stores will be inspected and compared to the list provided by the VSO and the integrity of packaging must be secure;
- ! All delivery vehicles will be screened; and,
- ! Delivery vehicles will not be allowed in restricted areas;

13.4 Delivery of Vessel Stores Requirements at MARSEC Level 3

- ! No vessel stores will be allowed to enter the facility.

Within the time prescribed within the MARSEC Directive, the owner or operator shall comply with the relevant instructions contained in MARSEC Directive issued by the Coast Guard.

14) Security Measures for Monitoring

Reference 33 CFR §105.275.

14.1 General

As previously described, operations at the site are intermittent. Considering that there are 3 - 4 cargo transfers per month and that a transfer takes place over 12 to 24 hours, the maximum amount of time requiring marine security at the site is approximately 96 hours. The facility is bounded on one side by an active waterfront facility, on one side by undeveloped property, on one side by the terminal end of a public road, and on the last side by the Gulf Intracoastal Waterway (GIWW). Security devices include a 6 foot chain link fence, a locked gate at the Sunray Road access point, locks on valves at the pipeline terminal, warning signs, automatic lighting, and manually operated lighting. Facility security personnel are on-site as long as there are vessels docked at the facility.

The following security measures and monitoring are conducted at the site:

- ! The FSO will inform the Facility Manager when vessels are scheduled to arrive;
- ! The Facility Manager will arrive at the site in time to complete pre-arrival security activities;
- ! Pre-arrival security activities will involve -
 - inspecting the entry gate, gate locks, fence, bulkhead area, pipeline terminal, valve locks, the automatic lighting, office trailer, storage building and warning

- signs,
- testing the manually operated lighting system for function, defective lights, and proper direction,
- correcting any deficiencies noted during the inspection and testing, and
- establishing anticipated authorized non-facility personnel;
- ! Upon arrival at the site, the Facility Manager will meet with the VSO, review the DoS, and obtain a signature from the VSO on the DoS if everything is in order;
- ! The Facility Manager will work with the vessel crew to prepare for cargo transfer;
- ! The Facility Manager will activate the manual security lighting system prior to sunset and after sunrise while vessels are docked at the facility;
- ! The facility security personnel will monitor the movement of authorized personnel and vehicles at the facility;
- ! The contract inspector will inspect the vessel cargo status and quality;
- ! Operations and security monitoring of the road access point, waterfront access, restricted area, and cargo transfer will be conducted continuously by facility security personnel; and,
- ! Inspection of vehicles and stores will be conducted by facility security personnel as necessary.

14.2 Monitoring Requirements at MARSEC Level 1

- ! No automatic intrusion devices are utilized;
- ! In the event of a power failure in low visibility situations, transfer of cargo will be suspended until security lighting can be restored;
- ! Security lighting is situated to illuminate the entire active portion of the facility including the access road, waterfront, non-restricted areas, and restricted areas;
- ! Vessel lighting will be required to augment facility lighting during low visibility periods; and,
- ! All lighting will be compliant with marine safety standards for prevention of navigation hazards due to lighting.

14.3 Monitoring Requirements at MARSEC Level 2

- ! Additional lighting may be provided by acquiring portable lighting systems;
- ! The Facility Manager will patrol the unrestricted, restricted, and waterfront areas; and,
- ! The General Manager will assist in monitoring the areas and access points;

14.4 Monitoring Requirements at MARSEC Level 3

- ! All lighting, including any additional lighting, will be switched on; and,
- ! All facility security personnel will comply with instructions issued by those responding to security incidents.

Within the time prescribed within the MARSEC Directive, the owner or operator shall comply with the relevant instructions contained in MARSEC Directive issued by the Coast Guard.

15) Security Incident Procedures

Reference 33 CFR §105.280.

15.1 Response to Security Threats or Breaches of Security

The following procedures will be utilized by facility security personnel to respond to security threats or breaches of security for each MARSEC Level.

- ! At MARSEC Levels 1 and 2, when security breaches occur, as identified in various sections in this plan, the perpetrator(s) will be confronted by facility security personnel;
- ! Failure of the perpetrator(s) to respond to the demands of facility security personnel will trigger emergency security reporting in which local police and Coast Guard immediate assistance will be requested and the vessel VSO alerted;
- ! If the perpetrator(s) makes physical threats to facility security personnel and/or property, operations will be terminated immediately and facility personnel will take measures to protect themselves, the vessel crew and, if possible without compromising their safety, facility property and the vessel;
- ! At the discretion of the FSO, the facility and vessel crew may be ordered to evacuate in accordance with Section 15.2 below; and,
- ! At MARSEC Level 3, when security breaches occur, as identified in various sections in this plan, facility security personnel will trigger emergency security reporting in which local police and Coast Guard immediate assistance will be requested and the vessel VSO alerted.

15.2 Evacuation

Upon the FSO's orders, the facility will be evacuated. The following procedures will describe evacuation at each MARSEC Level.

- ! At any MARSEC Level, when evacuation is ordered by the FSO, facility personnel and vessel crew will exit through the Sunray Road access point and proceed to the assembly area at the intersection of Sunray Road and FM 2725;
- ! Upon assembly at the assembly area, the FSO and VSO will count personnel to determine whether all personnel are present and accounted for; and,
- ! If it is possible, at the point of evacuation, all transfer connections will be removed, dock lines released, and the vessel allowed to get underway prior to facility personnel evacuation.

15.3 Reporting Security Incidents

The information provided in this section, including sample reporting forms, meet the security incident reporting requirements of §101.305, and can be referred to as such in the FSP of this section. The following procedures will be implemented at all MARSEC Levels.

15.3.1 Notification of Suspicious Activities

Any activity, considered by any facility security personnel to potentially result in a transportation security incident, will be reported, without delay, to:

The National Response Center (toll free):	1-800-424-8802
(direct telephone):	202/267-2675
(fax):	202/267-2165
(TDD):	202/267-4477
(Email):	1st-nrcinfo@comdt.uscg.mil

15.3.2 Notification of Breaches of Security

Any activity, considered by any facility security personnel to be a breach of security incident, will be reported, without delay, to the number(s) in item 15.3.1 above.

15.3.3 Notification of Transportation Security Incident (TSI)

Although the facility is not a marine transportation company, its proximity to a marine transportation waterway places facility security personnel in a position to potentially observe a TSI. Any activity, considered by any facility security personnel to be a TSI,

will be reported, without delay, to the number(s) in item 15.3.1 above.

15.4 Briefing of Facility Personnel

- ! For MARSEC Levels 2 and 3, the FSO will brief all facility personnel on possible threats and the need for vigilance, and will solicit their assistance in reporting suspicious persons, objects, or activities;
- ! The FSO will inform facility personnel of any reported persons, objects, or activities to be on the alert for, based on any information received from the Coast Guard; and,
- ! In the event facility personnel observe suspicious persons, objects, or activities, they will alert the FSO and VSO immediately.

15.5 Securing Non-critical Operations

The only operation at the site is the transfer of crude oil to and from vessels. No non-critical activities take place concurrently with transfer operations.

16) Audits and Security Plan Amendments

Reference 33 CFR §105.415.

16.1 Amendments

Amendments to the FSP that are approved by the cognizant COTP may be initiated by:

- ! The facility owner or operator; or,
- ! The cognizant COTP upon a determination that an amendment is needed to maintain the facility's security.

16.1.1 COTP Written Notice Amendment Request

When the facility receives written notice from the cognizant COTP, requesting the facility owner or operator propose amendments of its FSP addressing matters specified in the notice, the facility owner or operator shall submit its proposed amendments at least 60 days from the date of the notice. Until the amendments are approved, the facility owner or operator shall also ensure temporary security measures are implemented to the satisfaction of the COTP.

16.1.2 Proposed Amendments

Proposed amendments shall be submitted to the cognizant COTP. When initiated by the facility owner or operator, the proposed amendment shall be submitted at least 30 days before the amendment is to take effect unless the COTP allows a shorter period.

16.1.3 Validity of FSP

A FSP that is approved by the cognizant COTP is valid for five years from the date of its approval.

16.1.4 Owner/Operator Change

If there is a change in the owner or operator, the FSO shall amend the FSP to include the name and contact information of the new facility owner or operator and submit the affected portion of the FSP certifying that the FSP meets the applicable requirements of 33 CFR Part 105. A record of change form (See Attachment A - Forms) will be completed to document the change.

16.2 Frequency of Audits

The FSO shall ensure an audit of the FSP is performed annually, beginning no later than one year from the initial date of approval, and attach a letter to the FSP certifying that the FSP meets the applicable requirements of 33 CFR Part 105.

16.3 Types of Audits

The FSP shall be audited:

- ! If there is a change in the facility's ownership or operator; or,
- ! If there have been modifications to the facility, including but not limited to:
 - Physical structure,
 - Emergency response procedures,
 - Security measures, or
 - Operations.

16.3.1 Conducting Internal Audits

Internal audit procedures will be conducted as follows:

- Personnel conducting facility audits will either be company personnel or contract personnel qualified to conduct thorough audits;
- These personnel must have knowledge of methods for conducting audits and inspections, and security, control and monitoring techniques through previous experience or special training in these security related areas; and,
- If facility personnel are utilized for conducting the audits, they may not be personnel who have regularly assigned security duties and they must be independent of any security measures being audited.

16.3.2 Audits Requiring Amendments

If the results of an audit require amendment of the FSP, the FSO shall submit the amendments to the cognizant COTP for review and approval no later than 30 days after completion of the audit and a letter certifying that the amended FSP meets the applicable requirements of 33 CFR Part 105.

17) Facility Security Assessment (FSA) Report

Reference 33 CFR §105.305(d).

This section of the FSP constitutes the FSA Report and has been prepared for the facility based on a collection of background information, the on-scene survey conducted on May 14, 2004, and analysis of that information. Individual plan requirements delineated in 33 CFR §105.305(d) are addressed in detail in this report.

17.1 FSA Report Contents

17.1.1 Summary of On-Scene Survey

The on-scene survey was conducted by performing the following activities:

- Review of past records to determine any prior security actions, threats, breaches, or incidents;
- Interviewing on-scene personnel to obtain information about past activities, existing security measures, existing physical security devices, operations conducted at the site, materials handled at the site, and equipment involved in operations conducted at the site; and,
- Inspection of site conditions, identified security devices, and operational equipment.

17.1.2 Existing Security Measures

When the intermittent operations are conducted at the site, the following security measures are implemented:

- Prior to the arrival of a vessel, the Facility Manager conducts pre-arrival security activities described in Section 14.1 of the FSP, which includes inspection and testing of security equipment;
- The facility is surrounded by a 6-foot chain link fence, has one land access point on Sunray Road that can be controlled by a locked gate, has security lighting that operates photo-electrically, has security lights that operate manually, has locks on valves on the pipeline terminal, and has signs identifying security requirements and restricted areas;
- Personnel monitoring procedures include checking photo identification of non-facility personnel as described in Section 10.3;
- Communication between vessel and facility personnel, facility personnel on-site and facility personnel off-site, and facility personnel and emergency or government personnel is accomplished with the use of cellular telephones and VHF radios;
- Automatically operated photoelectric lighting is utilized at all times whether operations are underway or not;
- Manually operated lighting is utilized in low light situations and in accordance with regulations for the prevention of navigation hazards due to lighting; and,
- Access controls include keeping the land access gate locked and controlling who is issued keys when not in operation, signs are posted at the land access point that inform anyone approaching of certain security measures and policies, restricted areas are controlled utilizing signs posted at the boundary of the areas, operational equipment is controlled utilizing locks on valves, and the land access and waterfront access are controlled by facility security personnel.

17.1.3 Vulnerabilities

The facilities primary vulnerability is unauthorized entry into the facility, via land or water access points, when operations are not taking place and no facility security personnel are present to observe security breaches.

17.1.4 Addressing Vulnerabilities

The vulnerability is address by the pre-arrival procedures to conduct a detailed inspection of the site and the testing of security equipment.

17.1.5 Key Facility Operations

The only key facility operation is the transfer of crude oil to or from vessels docked at the facility. According to facility personnel, approximately 3 - 4 transfers take place each month and each transfer takes approximately 12 or 24 hours depending on whether one or two barges are being filled or emptied.

17.1.6 Identified Weaknesses

Weaknesses in human factors, the infrastructure, policies, and procedures of the facility were evaluated as follows:

Human Factors - To address human error, facility security personnel must undergo training to specifically identify their respective roles in the implementation of security measures at the site.

Infrastructure - Facility security systems must be inspected and maintained at all times, whether or not vessels are present.

Policies and Procedures - Policies and written procedures are necessary for the effective implementation of security measures for the site.

17.2 Description of Facility Security Elements

17.2.1 Physical Security

Physical security at the site consists of fencing, gates, locks, lights, and signs.

17.2.2 Structural Integrity

The physical security features were found to be structurally sound and maintained through regular inspections and testing.

17.2.3 Personal Protection Systems

There were no personal protection systems, with respect to security, at the facility.

17.2.4 Procedural Policies

Considering the extent of operation at the site, the fact that the facility is not located in a port, the facility is located on a commercial waterway that can be (and most often is) bypassed by coastal marine traffic, the waterway mostly services local facilities, and there are no major commercial plants near the site, the procedures implemented by the company appear to basically satisfy security requirements under normal circumstances when there are no heightened security concerns (See the SCG Operations Manual/Facility Spill Response Plan).

17.2.5 Radio and Telecommunication Systems

Communication systems include cellular telephones provided by the facility and vessel. VHF radios are also utilized and provided by the facility and vessel. These appear to be adequate to satisfy security communications requirements for the facility.

17.2.6 Relevant Transportation Infrastructure

The facility is not a marine transportation facility. Transport is only in the form of pipeline and contract barge service.

17.2.7 Utilities

Utilities at the site consist of electricity provided by the local electrical power company with a gasoline powered generator as backup.

17.3 Important Persons, Activities, Services, & Operations

17.3.1 Facility Personnel

Facility personnel consist only of the FSO, General Manager, Facility Manager, and an occasional driver.

17.3.2 Non-Facility Personnel

Non-facility personnel include vessel personnel, an inspector, vessel visitors, stores delivery personnel, emergency response personnel, and government authorities.

17.3.3 Emergency Response Capacity

Emergency response procedures are documented in the USCG approved Facility Spill Response Plan.

17.3.4 Cargo

No dangerous cargo, which could be used as an effective weapon, are managed at the facility.

17.3.5 Delivery of Vessel Stores

Delivery of vessel stores will be occasional and very infrequent due to the short term periods in which vessels are docked at the facility at any given time.

17.3.6 Security Communication and Surveillance System

Security communication systems include cellular telephones and VHF radios. No security surveillance system will be necessary due to the short term operations and relatively small area of the site.

17.4 Vulnerabilities

17.4.1 Conflicts Between Safety and Security Measures

The only noted conflict between safety and security measures is keeping the access gate at Sunray Road locked during operations. The access gate will be left open to prevent delays in the event of the need for rapid evacuation of the site. Facility personnel are situated, during operations, to enable them to monitor traffic entering and leaving through the gate.

17.4.2 Conflicts Between Duties and Security Assignments

Due to the relatively small area, the nature of the operation, and the number of facility personnel on-site, no conflicts between duties and security assignments were noted.

17.4.3 Fatigue Factor

Under routine circumstances, fatigue of security personnel on watch-keeping duty, that might impair alertness or performance, is not a factor due to the short term nature of operations and the number of facility security personnel on-site. Under heightened security conditions, the company is able to provide fresh personnel who could maintain effective security measures.

17.4.4 Security Training Deficiencies

Considering the quality of training and the limited security activities, security training appears to be adequate to address the security needs at the site.

17.4.5 Security Equipment

Considering the relatively small area of the site and the intermittent nature of activities, the available security equipment at the site appears to adequately address the security needs at the site.

17.5 Evaluation of Key facility Security Measures

17.5.1 Performance of Security Duties

The performance of security duties will not be demanding and do not conflict with duties of the operation. An adequate number of facility personnel are available and security duties are sufficiently distributed to provide for implementation of adequate security measures.

17.5.2 Controlling Access

The company controls access to the site by maintaining a fence and gate which is locked when no one is on-site. When personnel are present, they are able to see the only entry gate and the waterfront. They confront anyone attempting to enter the site that they do not recognize. No trespassing signs are also posted along the waterfront and around the entry gate.

17.5.3 Controlling the Embarkation of Vessel Personnel and Other Persons

No passenger vessels dock at the facility. Under normal circumstances, vessel personnel do not leave the vessel. Most vessel personnel are readily recognized by facility personnel. Facility personnel are always present when vessels are docked at the facility. The facility personnel confront anyone entering the site from land or water that are not readily recognized and do not allow unauthorized personnel on-site.

17.5.4 Cargo and Stores Handling

Due to the short term periods in which each vessel is docked at the facility, it is very uncommon for the vessel personnel to bring stores on board through the facility during operations. Due to the nature of the cargo, crude oil, many safeguards are in place and enforced to comply with the company's Operations Manual and Response Plan.

17.5.5 Monitoring Restricted Areas

Very little traffic occurs during operations. An adequate number of facility personnel will be available and security duties are sufficiently distributed to provide for effective monitoring of restricted areas.

17.5.6 Facility and Waterfront Monitoring

Very little marine traffic occurs during operations due to the remote location of the facility. An adequate number of facility and vessel personnel will be available and security duties are sufficiently distributed to provide for adequate monitoring of the facility and waterfront access.

17.5.7 Effectiveness of Communications

Communications equipment is provided by the facility and vessel and consists of cellular telephones and VHF radios that are on the facility personnel and vessel personnel at all times.

18) Facility Vulnerability and Security Measures Summary

Reference 33 CFR Part 105, Appendix A, Form CG-6025.

18.1 Form CG-6025

The facility Vulnerability and Security Measures Summary (Form (CG-6025) shall be completed using information in the FSA concerning identified vulnerabilities and information in the FSP concerning security measures in mitigation of the se vulnerabilities.

18.2 Instructions for Completing Form CG-6025

The instructions for completing the Form CG-6025 and Form CG-6025 are located on the next few pages.

19) Additional Requirements - Certain Dangerous Cargo Facilities

Reference 33 CFR §105.295.

19.1 Procedures for Security Measures at Certain Dangerous Cargo (CDC) Facilities at all MARSEC Levels

- ! The Facility Manager will control access in accordance with Section 10.3 which requires identification for all non-facility personnel not readily recognized by facility personnel;
- ! Parking and unloading of any stores at the facility is controlled in accordance with Section 11.3.7 of this FSP;
- ! Due to the relatively small area of the facility, facility security personnel are in view of each other at all times during operations;
- ! The Facility Manager will conduct the pre-arrival inspection of the areas, including the waterfront, prior to the arrival of each vessel in accordance with Section 14.1 of this FSP; and,
- ! In the event of a power failure, the facility will utilize an emergency power backup system for the security lighting system. Lighting is, also, provided by the vessel;

19.2 Security Measures at MARSEC Level 2

- ! Cargo transfers will not take place unless the FSO is present at the facility; and,
- ! Facility security personnel and vessel personnel will patrol the restricted areas and waterfront continuously.

19.3 Security Measures at MARSEC Level 3

- ! At MARSEC Level 3, the FSO will remind facility security personnel of the heightened level of concern and need for more diligent efforts in patrolling the site;
- ! The FSO may recruit additional facility personnel for more intense patrol efforts; and,
- ! Any additional personnel recruited by the FSO will undergo a security training and briefing session prior to implementing their assigned duties.

Within the time prescribed within the MARSEC Directive, the owner or operator shall comply with the relevant instructions contained in MARSEC Directive issued by the Coast Guard.